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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
MOTION FOR RELIEF FROM AND
EMERGENCY MOTION FOR STAY OF
NON-DISPOSITIVE PRETRIAL ORDER
OF MAGISTRATE JUDGE (DKT. 929)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
7 Seal Portions of Their Motion for Relief from and Emergency Motion for Stay of Non-Dispositive
8 Pretrial Order of Magistrate Judge (Dkt. 929) (the “Administrative Motion”). The Administrative
9 Motion seeks an order sealing highlighted portions of Defendants’ Motion for Relief from and
10 Emergency Motion for Stay of Non-Dispositive Pretrial Order of Magistrate Judge (“Uber’s Motion”)
11 and the entirety of Exhibit 1.

12 3. The green highlighted portions of Uber’s Motion and the entirety of Exhibit 1 contain
13 or reference trade secret and confidential business information, which Waymo seeks to seal.

14 4. Uber’s Motion (green highlighted portions) and Exhibit 1 (Exhibit 1) contain,
15 reference, and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal
16 includes the confidential design and functionality of Waymo’s proprietary autonomous vehicle
17 system, which Waymo maintains as secret. I understand that these trade secrets are maintained as
18 secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31).
19 The public disclosure of this information would give Waymo’s competitors access to descriptions of
20 the functionality or features of Waymo’s autonomous vehicle system. If such information were made
21 public, I understand that Waymo’s competitive standing would be significantly harmed.

22 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Motion and
23 Exhibit 1 that merit sealing.

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1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on July 21, 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Lindsay Cooper.
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12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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